



AUSA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA **'08 MJ 8668**

UNITED STATES OF AMERICA,
Plaintiff,

v.

Lleccenia BAINORI Gonzales ,
Defendant.

Magistrate Case No.:

COMPLAINT FOR VIOLATION OF
21 U.S.C. § 952 and 960
Importation of a Controlled Substance
(Felony)

The undersigned complainant being duly sworn states:

That on or about July 21, 2008, within the Southern District of California, defendant Lleccenia BAINORI Gonzales, did knowingly and intentionally import approximately 18.30 kilograms (40.26 pounds) of Marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

Special Agent
Immigration and
Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENT, THIS 22nd DAY OF
2008.

Peter C. Lewis
U.S. MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Llecenia BAINORI Gonzales

4
5 STATEMENT OF FACTS

6 This complaint is based on the personal observations, investigation, and
7 information furnished to Bureau of Immigration and Customs Enforcement Special
8 Agent Christina Gauthreaux.

9 On July 21, 2008, at approximately 1010 hours, Llecenia BAINORI Gonzales
10 along with her two minor children entered the United States from the Republic of
11 Mexico at the Calexico West Port of Entry. BAINORI was the driver and registered
12 owner of a white 2000 Chevy Impala bearing California license plate 6EMP009.

13 Primary CBP Officer F. Iniguez received a negative Customs declaration from
14 BAINORI. CBP Officer Iniguez then referred the vehicle to the secondary lot for further
15 inspection.

16 In Secondary, CBP Officer A. Gordon received another negative Customs
17 Declaration. CBP Officer Gordon began inspection of the vehicle and noticed a
18 discrepancy in the trunk area near the back seat. CBP Officer Gordon pulled the back
19 seat forward and discovered packages wrapped in plastic located in a compartment
20 behind the rear seats. CBPO Dhillon was then requested to take over processing the
21 seizure. CBPO Dhillon placed BAINORI under arrest and BAINORI responded that she
22 already knew she was under arrest.

23
24 CBP Officer Dhillon discovered a total of 36 packages, concealed in plastic wrap.
25 A presumptive field test indicated the contents of these packages to be marijuana. The
26 total weight of the packages was approximately 18.30 kilograms (40.26 pounds).

27 BAINORI was notified of her arrest and advised of her Miranda Rights.
28 BAINORI was processed and transported to Imperial County Jail.
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